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MINNEAPOLIS, MINNESOTA

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9 UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF MINNESOTA

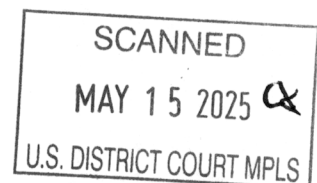
12 Steve Salvador Ybarra
13 Self-Represented
14 Pro Se Litigant,
15
16 Plaintiff,

17 v.

18 Legal Assistance of Dakota County;
19 Sharon Jones Esq., in her Individual
20 and
21 Official capacities;
22 Hon. David Lutz, in his individual
23 and
24 Official capacities;
25 Hon. Tanya Obrien, in her individual
26 and official capacities;
27 Hon. Dannia L Edwards, in her
28 individual and official capacities;
Lydia Clemens, in her individual and
official capacities;
Michelle Cathleen Ybarra,
Defendants.

No. . 0:25-cv-01948-KMM-DJF

**PLAINTIFF'S SUPPLEMENTAL
MEMORANDUM ON ATTORNEY
GENERAL OVERSIGHT AND
CONSTITUTIONAL IRONY**



Plaintiff respectfully submits this memorandum to address a broader and now
unavoidable truth: the structural misconduct documented in this case is not
happening in the shadows. It is unfolding under the watch of an Attorney General

1 who built his reputation on protecting people like me.

2 3 I. THE CIVIL RIGHTS PEDIGREE OF MINNESOTA'S ATTORNEY 4 GENERAL

5 Keith Ellison, Minnesota's 30th Attorney General, was sworn in on January 7,
6 2019, under the banner of justice, equity, and constitutional protection. Before that,
7 he served 12 years in the U.S. House of Representatives as a national civil rights
8 voice, and as the former executive director of the Legal Rights Center. He made his
9 career fighting for dignity, safety, and **due process** for underserved communities.
10 His official biography repeatedly emphasizes his commitment to defending "**those**
11 **who have nowhere else to turn.**"

12 As a Latino (Mexican American) father, filing pro se to protect my
13 fundamental parental rights, I never expected to find myself on the receiving end of
14 an AG's litigation strategy defending:

- 15 • Sealed fraud by Legal Aid,
- 16 • Structural judicial conflict through the appointment of a former board
- 17 member of a named defendant to the bench,
- 18 • Parental alienation codified under sealed protective orders,
- 19 • And procedural obstruction that would have once driven a younger Keith
- 20 Ellison to organize press conferences and march into courtrooms.

21 22 II. WHAT THE RECORD NOW SHOWS

23 The record before this Court includes:

- 24 • A Legal Aid attorney, **Sharon Jones**, not only ghostwrote sealed affidavits on
- 25 behalf of an ineligible litigant, but also **drafted ex parte orders** presented to
- 26 the Court under false pretenses and **suppressed material discovery for**
- 27 **over a year**, obstructing access to evidence central to Plaintiff's
- 28 constitutional claims.

- 1 • The suppression of exculpatory CPS reports and GAL misconduct behind
- 2 closed files;
- 3 • A judicial officer (David Lutz) refusing to recuse himself despite known
- 4 affiliations with LADC;
- 5 • And the recent appointment of **Kelly Staples**, a former **board member of**
- 6 **LADC**, to the **First Judicial District bench**, even while federal litigation
- 7 involving LADC remains pending.

8 At the center of it all is the Office of the Attorney General—defending the
9 structure, preserving the silence, and protecting the enterprise.

10 11 **III. THE IRONY THAT CANNOT BE IGNORED**

12 The irony is thick.

13 The People's Lawyer—a man who fought against sealed systems of structural
14 inequality, who defended the rights of the marginalized, who spoke powerfully
15 about government abuse of power—now has his Office defending:

- 16 • Ghostwritten protective orders;
- 17 • Judicial refusal to confront fraud;
- 18 • And the exclusion of a father from his son's life based on sealed, suppressed,
- 19 and procedurally tainted evidence.

20 It should not be this way. It does not have to be.

21 22 **IV. CONCLUSION**

23 This filing is not a rhetorical shot. It is a procedural plea:

- 24 • To acknowledge the depth of what has occurred;
- 25 • To confront the growing pattern of judicial insulation and sealed evasion;
- 26 • And to remind this Court that silence in the face of systemic suppression is
- 27 not neutrality. It is entrenchment.

Respectfully submitted,

/s/ Steve Salvador Ybarra

Steve Salvador Ybarra

Pro Se Litigant

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Footnotes (All citations to U.S.C. and Federal Rules unless otherwise noted)

Keith Ellison served as Executive Director of the Legal Rights Center, a nonprofit law firm in Minneapolis that focused on criminal defense and civil rights. He later became the first Muslim American elected to Congress and was known nationally for his advocacy in racial justice, housing, and antitrust.

1. Plaintiff's filings include certified letters, email communications, and multiple sworn declarations documenting the chain of procedural obstruction and sealed misconduct, available in the Preliminary Injunction filings and accompanying Exhibits B and C.
2. The judicial entrenchment at issue involves not merely passive bias, but active procedural concealment, including sealed affidavits, refusal to adjudicate fraud motions, and the elevation of Legal Aid's board member to the same bench overseeing custody rulings. See *CAPERTON V. A.T. MASSEY COAL CO.*, 556 U.S. 868 (2009).
3. *PULLIAM V. ALLEN*, 466 U.S. 522 (1984), remains binding precedent establishing that judicial immunity does not bar prospective injunctive relief or federal intervention when judicial acts result in ongoing constitutional violations.

CERTIFICATE OF SERVICE

I hereby certify that on **May 14, 2025**, I served a true and correct copy of the attached:

**PLAINTIFF'S SUPPLEMENTAL MEMORANDUM ON ATTORNEY
GENERAL OVERSIGHT AND CONSTITUTIONAL IRONY**

upon the following parties by email and/or U.S. Mail:

- **Legal Assistance of Dakota County**

Email: admin@dakotalegal.org

- **Sharon Jones, Esq.**, in her individual and official capacities

Legal Assistance of Dakota County

Email: sjones@dakotalegal.org

- **Hon. David Lutz**, in his individual and official capacities

Dakota County District Court

1560 Highway 55, Hastings, MN 55033

Email: Raymond.mestad@courts.state.mn.us

- **Hon. Tanya O'Brien**, in her individual and official capacities

Dakota County District Court

1560 Highway 55, Hastings, MN 55033

Email:

- **Hon. Dannia L. Edwards**, in her individual and official capacities

Dakota County District Court

1560 Highway 55, Hastings, MN 55033

Email:

- **Lydia Clemens**, Guardian ad Litem, in her individual and official capacities

First Judicial District GAL Program

Email: Lydia.clemens@courts.state.mn.us

- **Michelle Cathleen Ybarra**, Respondent

Email: shellbell@hotmail.com

This notice was served to all named parties via email where available and U.S. Mail where necessary, consistent with Fed. R. Civ. P. 5(b) and Local Rule 7.1.

1 Respectfully submitted,

2 /s/ **Steve Salvador Ybarra**

3 Pro Se Litigant

4 Steve@TheoryWerkx.com

5 (612) 544-4380

6 Executed May 14, 2025

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